**To:** Grevatt, Peter[Grevatt.Peter@epa.gov]

**Cc:** Beauvais, Joel[Beauvais.Joel@epa.gov]; Thompkins, Anita[Thompkins.Anita@epa.gov]; Bergman, Ronald[Bergman.Ronald@epa.gov]; Greene, Ashley[Greene.Ashley@epa.gov]; Montgomery, Michael[Montgomery.Michael@epa.gov]

From: Albright, David

**Sent:** Fri 2/12/2016 2:39:42 PM

Subject: RE: The Aquifer Exemption Process for the Arroyo Grande Oilfield, California

Hi Peter.

Here is a brief summary we wrote for our weekly report to Jared.

California Requests Expansion of Aquifer Exemptions: On February 8th, the CA Division of Oil, Gas, and Geothermal Resources (DOGGR) submitted to Region 9 a request to expand the boundaries of an existing aquifer exemption within the Arroyo Grande oil field in San Luis Obispo County. The package from DOGGR, with State Board concurrence, is the first of about 50 such requests that we expect the state to submit for new and expanded aquifer exemptions. These exemption requests, when approved, would allow for the continued injection of fluids for enhanced oil recovery and waste water disposal and are a key element of the state's efforts to return their Class II Underground Injection Control program into compliance with the Safe Drinking Water Act.

As noted, we just received the package the other day, although we have been expecting this request to come in for some time. We have a task order under the OGWDW Cadmus contract for them to review the submittal and my staff is also reviewing it. We are developing a communication strategy for the decision-making process and will be developing another one prior to announcing EPA's final decision.

One of the first steps in the review process will be to make a determination as to whether this is a substantial or non-substantial exemption request. We expected most requests, including this one, to be non-substantial but we'll have to dig into the package more and also review what CBD submitted on that issue. We will definitely be coordinating with your folks and the attorneys.

I am copying Mike on this email. He will be in the office if you need additional information today.

Thanks,

From: Grevatt, Peter

**Sent:** Thursday, February 11, 2016 4:29 PM **To:** Albright, David < Albright. David@epa.gov>

Cc: Beauvais, Joel <Beauvais.Joel@epa.gov>; Thompkins, Anita

<Thompkins.Anita@epa.gov>; Bergman, Ronald <Bergman.Ronald@epa.gov>; Greene, Ashley

<Greene.Ashley@epa.gov>

Subject: RE: The Aguifer Exemption Process for the Arroyo Grande Oilfield, California

David, I'll check in with my folks so see what they know, but it will be helpful if you can provide us with some background on this one. Thanks, P. Grevatt

From: Laura McCamy [mailto:LMcCamy@biologicaldiversity.org]

Sent: Thursday, February 11, 2016 6:43 PM

**To:** Kobelski, Bruce < Kobelski.Bruce@epa.gov >; Grevatt, Peter < Grevatt.Peter@epa.gov >;

Beauvais, Joel < Beauvais. Joel @epa.gov >

Cc: Albright, David < Albright. David@epa.gov >; Maya Golden-Krasner

<MGoldenKrasner@biologicaldiversity.org>

Subject: The Aguifer Exemption Process for the Arroyo Grande Oilfield, California

Dear Mr. Kobelski, Mr. Grevatt, and Mr. Beauvais,

Attached please find a letter from Maya Golden-Krasner of the Center for Biological Diversity regarding the Center's concerns about the EPA's aquifer exemption review for the Arroyo Grande Oilfield in San Luis Obispo County, California. The references cited in the letter follow via FedEx; you should receive them on February 12, 2016.

If there is anyone else at EPA that you believe we should contact about this aquifer exemption process, please forward this letter to them. Please don't hesitate to contact us if you have any

questions.

Laura McCamy

Climate Law Institute Paralegal

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